

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION

HYBRID KINETIC AUTOMOTIVE  
HOLDINGS, INC. and AMERICAN COMPASS, INC.

PLAINTIFFS

VS.

CIVIL ACTION NO. 3:09-CV-35-M-A

HYBRID KINETIC AUTOMOTIVE CORP.,  
CHARLES WANG, JACK DENG, GARY TANG,  
and NICHOLE DENTON

DEFENDANTS

\* \* \*

HYBRID KINETIC AUTOMOTIVE CORPORATION,  
CHARLES, WANG, JACK DENG, GARY TANG,  
NICHOLE DENTON, BETHANY TURNER,  
KONG BING OEI, PETER KREUTER AND  
MOTOREN-und ENGINE-TECHNIC GmbH

THIRD-PARTY PLAINTIFFS

VS.

YUNG (BENJAMIN) YEUNG A/K/A RONG YANG,  
RHEA YEUNG, VINCENT WANG, JIMMY WANG,  
QUAN LIU, ZHENGSHAN LI, ZHENGWEI ZHANG,  
HONGYU SUN, HYBRID KINETIC AUTOMOTIVE  
HOLDINGS, INC., HYBRID KINETIC MOTORS  
CORPORATION, THE ALABAMA CENTER  
FOR FOREIGN INVESTMENT, LLC, FAR EAST  
GOLDEN RESOURCES GROUP, LTD. AND  
AMERICAN COMPASS INC.

THIRD-PARTY DEFENDANTS

**MOTION TO WITHDRAW AS COUNSEL**

Pursuant to Local Rule 83.1(B)(3), Morris, Manning & Martin, LLP hereby moves for an Order designating the law firm of Liner Grode Stein Yankelevitz Sunshine Regenstreif & Taylor LLP, admitted *pro hac vice*, as lead counsel to plaintiffs Hybrid Kinetic Automotive Holdings, Inc. and American Compass, Inc. (collectively, "Plaintiffs"), and relieving the law firm of Morris, Manning & Martin, LLP from all further responsibility in this matter. As grounds for the

motion, Morris, Manning & Martin, LLP submits: 1) Plaintiffs have been notified of and consent to Morris, Manning & Martin, LLP's withdrawal from this matter; and 2) all counsel of record in this case have been notified of said withdrawal.

WHEREFORE, based on the foregoing, it is respectfully requested that the Court grant this Motion To Withdraw As Counsel.

Respectfully submitted,

MORRIS, MANNING  
& MARTIN, LLP

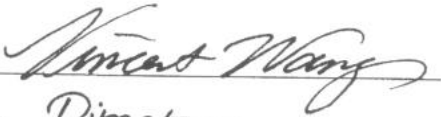
1600 Atlanta Financial Center  
3343 Peachtree Road, NE  
Atlanta, Georgia 30326

By:   
William J. Sheppard, Esq.

Date: May 12, 2009

AND

Plaintiffs Hybrid Kinetic Automotive  
Holdings, Inc. and American Compass, Inc.

By:   
Title: Director

Date: May 7, 2009

**CERTIFICATE OF SERVICE**

I, William J. Sheppard, do hereby certify that I have this day delivered via e-mail a true and correct copy of the above and foregoing MOTION TO WITHDRAW AS COUNSEL to the following:

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This 12<sup>th</sup> day of May, 2009.

MORRIS, MANNING & MARTIN, LLP

/s/ William J. Sheppard  
William J. Sheppard